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EDGAR RAFAEL NAVARRO CHAVOYA  
7

8 IN THE UNITED STATES DISTRICT COURT  
9 FOR THE EASTERN DISTRICT OF CALIFORNIA  
10

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 vs.

14 EDGAR RAFAEL NAVARRO  
CHAVOYA,

15 Defendant.  
16

Case No. 1:21-cr-00314-JLT-SKO

**STIPULATION TO ADD CONDITION OF  
PRETRIAL RELEASE; ORDER**

17 IT IS HEREBY STIPULATED by and between the parties through their respective  
18 counsel, Assistant United States Attorney Joseph Barton, counsel for plaintiff, and Assistant  
19 Federal Defender Erin Snider, counsel for Edgar Rafael Navarro Chavoya, that the Court may  
20 add the following condition of pretrial release: "You must surrender your passport to the Clerk,  
21 U.S. District Court, and you must not apply for or obtain a passport or any other travel  
22 documents during the pendency of this case."

23 On December 15, 2021, the Court ordered Mr. Navarro Chavoya released on a \$100,000  
24 property bond. *See* ECF #7. Amongst other conditions, the Court ordered Mr. Navarro Chavoya  
25 to "not apply for or obtain a passport or any other traveling documents during the pendency of  
26 this case." *See* ECF #18. Because Mr. Navarro Chavoya had reported to Pretrial Services that he  
27 did not possess a passport or other travel document, there was no condition requiring him to  
28 surrender such document.

Mr. Navarro Chavoya recently obtained a Mexican passport, as he needed additional identification in order to obtain a driver's license. At the time, Mr. Navarro Chavoya had simply overlooked the condition of his pretrial release prohibiting him from applying for a passport. He mentioned to his Pretrial Services Officer, Magarita Zepeda, that he had obtained the passport, and she reminded him that he was prohibited from doing so under the conditions of his release. Because Mr. Navarro Chavoya's error was inadvertent, Pretrial Services and the government are in agreement that no violation petition is warranted. Instead, the parties agree that Mr. Navarro Chavoya should simply surrender the passport to the Clerk of Court. Accordingly, the parties request that the Court add the following condition, so that the Clerk of Court will take possession of the passport: "You must surrender your passport to the Clerk, U.S. District Court, and you must not apply for or obtain a passport or any other travel documents during the pendency of this case."

Respectfully submitted,

PHILLIP A. TALBERT  
United States Attorney

Date: August 2, 2023

/s/ Joseph Barton  
JOSEPH BARTON  
Special Assistant United States Attorney  
Attorney for Plaintiff

HEATHER E. WILLIAMS  
Federal Defender

Date: August 2, 2023

/s/ Erin Snider  
ERIN SNIDER  
Assistant Federal Defender  
Attorney for Defendant  
EDGAR RAFAEL NAVARRO CHAVOYA

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**ORDER**

The Court hereby modifies the conditions of Mr. Navarro Chavoya's pretrial release to add the following: "You must surrender your passport to the Clerk, U.S. District Court, and you must not apply for or obtain a passport or any other travel documents during the pendency of this case." Mr. Navarro Chavoya is directed to surrender his passport within 7 days of the date of this Order.

IT IS SO ORDERED.

Dated: August 2, 2023

/s/ Eric P. Grogan  
UNITED STATES MAGISTRATE JUDGE